

REMARKS

Claims 1, 3-13, 15-18 and 20-26 are pending. Claims 1, 7, 8, 16-18 and 21-23 have been amended herein. Claim 2, 14 and 19 have been canceled. Support for the amendments to claims 1, 7 and 8 is based on canceled claims 2 and 14 which are incorporated. Additional support for the amendments to claims 7, 8, 16-18 and 21-23 is found at page 3, lines 33-35 of the specification.

Applicants' response to Rejection Under 35 USC §102(b)

Claims 1, 4-13, 16-18 and 21-23 stand rejected under 35 USC 102(b) over the disclosure of the Lipson published European Patent Application 0 128 014 A2 (EP 128014 A2); and claims 2, 3, 14, 15, 19 and 20 stand rejected under 35 USC 102(b) over the disclosure of the Ishikawa published Japanese Patent Application 10-020491 A (JP 10-020491A). In response thereto, Applicants have amended independent claims 1, 7 and 8 so as to more distinctly claim the subject matter Applicants regard as the invention. Specifically, claim 1 has been amended to include the limitation wherein the photo-polymerization inhibitor is a 2, 4, 5-triarylimidazole dimer. Claims 7 and 8 are similarly amended and likewise have been amended to include the limitation that "a carboxyl group-containing binder polymer which contains styrene or a styrene derivative as a copolymerized constituent." Applicants in addition respectfully traverse as follows:

Applicants respectfully submit that Lipson publication and Ishikawa publication do not disclose components (C), (C') and (C'') wherein m is 6 to 18 or 6 to 20. Furthermore, the Lipson publication does not disclose a 2,4,5-triarylimidazole dimer, which is used in the

claimed invention as (B) a photo-polymerization initiator, and Ishikawa publication does not disclose the component (A), which is a binder polymer containing styrene or a styrene derivative as a copolymerized constituent. Therefore, the claimed invention is not anticipated by Lipson et al. or Ishikawa. The differences between the claimed invention and Ishikawa are further described in the attached Declaration, to which Applicants respectfully refer. Wherefore, in light of the amendments to the claims, the above remarks and the accompanying §132 Declaration, Applicants respectfully request favorable reconsideration.

Applicants' Response to the Rejection under 35 USC 103(a)

Claims 2, 3, 14, 15, 19 and 20 stand rejected under 35 USC 103(a) as being unpatentable over Lipson et al. (EP 128014 A2) as applied to claims 1, 4-13, 16-18 and 21-23 above, and further in view of Ishikawa et al. (JP 10-020491 A).

Applicants respectfully submit that one skilled in the art would not derive the current invention as set forth in amended claims 1 and 7 and their corresponding dependent claims, because the results obtained from the specific combination are unexpected.

Lipson discloses component (A), but does not teach or suggest using a 2,4,5-triarylimidazole dimer and the specific component (C), (C') or (C''). Ishikawa discloses (B) a 2,4,5-triarylimidazole dimer as a photopolymerization initiator, but does not teach or suggest using the 2,4,5-triarylimidazole dimer in combination with component (A) and the specific component (C), (C') or (C'').

According to the claimed invention, the occurrence of scum is prevented and the adhesiveness of the resulting film is improved by the combined use of the specific

components (A), (B) and (C), (C') or (C''). Such effects are apparent from the following comparisons.

As set forth in the attached §132 Declaration, Comparison of Example 1, Experiments 1, 2 and 4 with Comparative Example 1 and Experiment 3 show that the specific component (C), (C') or (C'') wherein m is 6 to 18 or 6 to 20 prevents scum, while similar compounds wherein m is less than 6 cause scum. Neither Lipson nor Ishikawa teach or suggest that an effect of the component (C), (C') or (C'') wherein m is 6 to 18 or 6 to 20 prevents scum.

Comparison of Example 1 and Experiment 6 shows that using a 2,4,5-triarylimidazole dimer as a photopolymerization initiator improves the adhesiveness of the product film. Comparison of Example 1 with Example 3 and comparison of Example 2 with Example 4 on file in the third Preliminary Amendment filed March 4, 2003, show that even if a 2,4,5-triarylimidazole dimer is used, the adhesiveness cannot be improved in the absence of styrene or styrene derivative units in the binder polymer. Hence, Applicants respectfully submit that neither Lipson nor Ishikawa teach or suggest the adhesiveness-improving effects of binder polymers containing styrene or styrene derivative units, 2,4,5-triarylimidazole dimer or combined use thereof.

That is, the above-described effects of prevention of scum and improvement of adhesiveness attained by the combined use of the specific components (A), (B) and (C), (C') or (C'') are not expected from the teaching of Lipson, Ishikawa or a combination thereof. Therefore, Applicants respectfully submit the claimed invention is not obvious over the

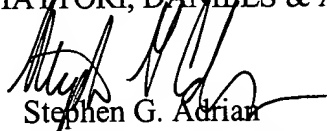
combined teaching of Lipson et al. and Ishikawa, and favorable reconsideration is requested.

For at least the forgoing reasons, the presently claimed invention distinguishes over the cited art and defines patentable subject matter. Favorable reconsideration is earnestly solicited.

In the event that this paper is not timely filed, Applicant respectfully petition for an appropriate extension of time. The fees for such an extension or any other fees that may be due with respect to this paper may be charged to Deposit Account No. 50-2866.

Respectfully submitted,

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Attachments: Declaration of Takeshi Oohashi, et al.
Petition for Extension of Time
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202-822-1100 (t)
202-822-1111 (f)